

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
ANGELA ANESSA JAMERSON	:	
Debtor	:	CASE NO. 1:17-bk-02721
	:	
Nationstar Mortgage LLC d/b/a Mr.	:	
Cooper	:	
Movant	:	
	:	
v.	:	
	:	
ANGELA ANESSA JAMERSON	:	
Respondent	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted; however, there was a reassignment of the case to Trustee Jack N. Zaharopoulos due to retirement of Trustee Charles J. DeHart, III.
4. Admitted that Movant is a secured creditor; however, debtor is in the process of refinancing and the exact balance of the mortgage is unknown - therefore the remainder of the paragraph is denied.
5. Denied. Debtor has been making payments but believes that payments are not being properly credited.
6. The Debtor lacks knowledge or information sufficient to form a belief as to the truth of this averment, and therefore denies the same. See also response to paragraph 5.
7. Denied. Debtor has made the payments.
8. Denied. Debtor has made the payments.
9. Denied. Debtor has made the payments.
10. This paragraph is a conclusion of law to which no answer is necessary; to the extent that an answer is deemed necessary, it is denied.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Kara K. Gendron
Kara K. Gendron, Esquire
Attorney ID 87577
Mott & Gendron Law
125 State Street
Harrisburg, PA 17101
(717) 232-6650 TEL
(717) 232-0477 FAX
karagendron@gmail.com